

IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF PENNSYLVANIA

UNITED STATES OF AMERICA)	
)	
v.)	Criminal No. 05-2 E
)	
KEITH ALLEN PROCTOR)	

MOTION TO AMEND CONDITIONS OF BOND

AND NOW, comes the defendant, KEITH ALLEN PROCTOR, by his attorney, Thomas W. Patton, Assistant Federal Public Defender, and respectfully files this Motion to Amend Conditions of Bond, and in support thereof sets forth as follows:

1. The defendant, Keith Allen Proctor, has been charged in a three-count indictment with violations of Title 18, U.S.C. §§ 2252(a)(1), 2252(a)(2) and 2252(a)(4)(B); transportation of, receipt of, and possession of material depicting the sexual exploitation of a minor and receipt of obscene material.

2. On March 9, 2006, Mr. Proctor pled guilty, and this Court amended Mr. Proctor's conditions of release, setting forth the following conditions:

- a. Report to Pretrial Services in the manner required by pretrial;
- b. No contact with minors except for supervised visits with his own children;
- c. Restricted to his residence at all times except for employment, education, religious services, medical, substance abuse, or mental health treatment, attorney visits, court appearances, court-ordered obligations, or other activities as pre-approved by the pretrial services office or supervising officer.
- d. Restricted from computer use and connection to the internet.

3. Mr. Proctor has complied with all of the conditions of his bond.

4. Mr. Proctor respectfully requests that this Court amend his bond to allow him to attend a concert at the Erie Civic Center with his wife on Friday, November 10, 2006 from 7:00 p.m. to 11:00 p.m.

5. Assistant United States Attorney Christian A. Trabold does not object to this motion.

WHEREFORE, the defendant, KEITH ALLEN PROCTOR, respectfully requests that this Honorable Court Amend the Conditions of his Bond.

Respectfully submitted,

/s/ Thomas W. Patton
Thomas W. Patton
Assistant Federal Public Defender
PA I.D. No. 88653